



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

July 29, 1994

Mr. Fred Evans  
Department of the Navy  
Northern Division  
Naval Facilities Engineering Command  
10 Industrial Highway, Mailstop 82  
Lester, PA 19113-2090

Re: Additional Comments on  
Draft Record of Decision  
for an Interim Remedial Action at Site 9  
NAS Brunswick  
June 1994

Dear Fred:

The United States Environmental Protection Agency's (EPA) additional comments on the above referenced document are found in Attachment I of this letter. Should you have any questions regarding the EPA's comments, please feel free to call me at (617) 223-5521.

Sincerely,

*Robert Lim*

Robert Lim, Remedial Project Manager  
Federal Facilities Superfund Section

Attachment

cc. Meghan Cassidy/EPA  
Margery Adams/EPA-ORC  
Steve Mierzykowski/USFWS  
Nancy Beardsley/MEDEP  
Jim Caruthers/NASB  
Elizabeth Walter/ABB-ES (w/ disk)  
Susan Weddle/BASCE  
Carolyn LePage/Gerber, Inc.  
Sam Butcher/Harpswell Community Rep.  
Rene Bernier/Topsham Community Rep.



## ATTACHMENT I

The following are the EPA's additional comments pertaining to the document entitled **Draft Record of Decision for an Interim Remedial Action at Site 9** dated June 1994.

1. Page 1, last ¶: Delete the words "imminent and substantial." Although this is model language, it is based on enforcement concerns at non federal facility sites. Given that we're proposing a monitoring-only interim action, the endangerment is probably not imminent and substantial.
2. Page 2, ¶ 1: Add the words "to prevent exposure to contaminated groundwater" after "institutional controls."
3. Page 2, ¶ 3: After the second sentence, add "This interim remedy will control risks posed by the site, and will be consistent with a final remedy for the site."
4. Page 10, Section B, Bullet 5: State what the TRC is (a group composed of citizens, the Navy, etc...) since this is the first time this term is used.
5. Page 19, Section C: This summary focusses on exceedances of vinyl chloride, but DCA was detected above the MEG, and DCE was detected above the MCL. Since we are setting cleanup standards for DCA and DCE, they should be referenced in this paragraph.
6. Page 22, ¶ 3: Although groundwater is not a current drinking water source, the EPA feels that it is a bad idea to state that groundwater is not likely to be a drinking water source in the future since that statement seems to undercut the whole point of trying to reach MCLs (even through natural attenuation). The EPA usually takes the view that the simple existence of an alternate water supply is not sufficient reason to assume that site groundwater will never be used. In summary, given that this statement regarding future groundwater use undercuts the rationale for trying to attain MCLs, the EPA suggests deleting the words "or likely to be used in the future" from the second sentence of paragraph 3.
7. Page 23, last ¶: Discussion of ecological risk is too truncated, in that it doesn't deal with the fact that the Proposed Plan says that ecological risk associated with sediments may be unacceptable. To address this, the EPA suggests adding a sentence after the third sentence, stating: "In particular, exposure to contaminants (DDT and PAHs) from sources other than Site 9 groundwater may be associated with potential risks to aquatic organisms." Change the last sentence to read, "These risk estimates

will be used to determine the need for additional remedial action in the stream sediments and surface waters at Site 9, and will be presented in the final ROD or source operable unit ROD for this Site."

8. Page 25, ¶ 2, third line: Delete the words "imminent and substantial." Same rationale as above.
9. Page 28, Alternative B: Typically, the EPA requires that natural attenuation must be compared to groundwater pump and treat, but the consensus at Site 9 is that natural attenuation is the remedy because active restoration is not warranted. For consistency, the EPA suggests adding a statement within this alternative that active restoration was not warranted because of site-specific conditions (i.e., sporadic detections of contaminants).
10. Page 32, paragraph beginning "The state acceptance criterion...": It is incorrect to suggest that state acceptance is only limited to review and comment on the proposed plan and other deliverables. The state has the right to submit comments during the public comment period. The EPA suggests adding a sentence after the saying that state acceptance will be finally evaluated after the public comment period.
11. Page 33, Comparative Analysis Section on ARARs: OSHA is not an ARAR.
12. Page 35, Section on the Selected Remedy: Make the last sentence on page 35 into a separate paragraph. Add a final sentence saying, "In addition, the need for remedial action in sediments and surface waters in the streams will be evaluated and addressed in the final ROD for Site 9 or in a separate operable unit ROD."
13. Page 36, Natural Attenuation Section: Suggest adding the fact that, at present, the Navy believes there is no continuing source, and that this hypothesis will be tested over the coming years.

Typically, the EPA requires that natural attenuation must be compared to groundwater pump and treat, but the consensus at Site 9 is that natural attenuation is the remedy because active restoration is not warranted. For consistency, the EPA suggests adding a statement within this description that active restoration was not warranted because of site-specific conditions (i.e., sporadic detections of contaminants).

14. Page 38, Section XI, 1st paragraph. Add at the end of this paragraph, "The selected remedy is an interim action which

will be consistent with the final remedy that will be selected for Site 9."

15. Page 40, para. on Federal and State Drinking Water Regulations: Add a sentence stating: "In the case of DCA, because no MCL or other ARAR exists, it is appropriate to consider the Maine Maximum Exposure Guideline ("MEG") in setting a cleanup level. Use of the MEG of 5 ug/l will reduce the risks to levels which are within EPA's acceptable risk range of  $10^{-4}$  to  $10^{-6}$ . MEGs are developed by the State of Maine based on federal standards, health advisories and environmental toxicology methods."
16. Page 42, para. 2. After the words "will be necessary" add the words "for a complete remedy at the site that will meet the preference..."
17. Table 9: Revise "Consideration in the FS" to "Action to be Taken to Attain ARAR," and change wording of each entry in that column accordingly. For example, in discussion of MCLs and in the discussion of RCRA MCLs, state: "Under Alternative 9B, the selected remedy, MCLs will be attained through natural attenuation within 2-15 years."

Discussion of MCLGs should be deleted. Only non-zero MCLGs are ARARs. In this case, since the only non-zero MCLGs at issue (DCE) is the same as the MCL, it is not necessary to refer to MCLGs.

In discussion of MEGs, state: "Where no MCL or other ARAR exists, MEGs are considered in developing cleanup levels. The cleanup level for DCA was established using the MEG. Under Alternative 9B, the selected remedy, the MEG for DCA will be attained through natural attenuation within 2-15 years."